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*Counsel to the Ad Hoc Group of Hospitals*

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In re:

PURDUE PHARMA L.P., *et al.*

Debtors.<sup>1</sup>

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)  
) Chapter 11  
)  
) Case No.: 19-23649 (RDD)  
)  
) (Jointly Administered)

**SECOND AMENDED VERIFIED STATEMENT OF THE AD HOC GROUP OF  
HOSPITALS PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), a group of hospitals (the “Ad Hoc Group of Hospitals”) that have treated and treat patients for conditions related to the use of opiates manufactured by Purdue Pharma L.P. and/or the other debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), hereby submits this second amended verified statement pursuant to Fed. R. Bankr. P. 2019 (this “Amended Verified Statement”) and, in support thereof, states as follows:

1. On or about November 26, 2019, the Ad Hoc Group of Hospitals was formed. On or about April 23, 2020, the Ad Hoc Group of Hospitals retained McGrail & Bensinger LLP (“M&B”) as

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014).

substitute counsel in the Debtors' chapter 11 cases.<sup>2</sup>

2. On December 3, 2019, the Ad Hoc Group of Hospitals filed its original verified statement pursuant to Fed. R. Bankr. P. 2019 [Docket No. 577] (the "Original Verified Statement").

3. On July 10, 2020, the Ad Hoc Group of Hospitals filed its (first) amended verified statement pursuant to Fed. R. Bankr. P. 2019 [Docket No. 1368] (the "First Amended Verified Statement"). Since the filing of the First Amended Verified Statement, additional hospitals across the United States that have treated and treat patients for conditions related to the use of opiates manufactured by some or all of the Debtors have joined the Ad Hoc Group of Hospitals. We file this second amended statement to add these additional hospitals.

**Amended Composition of the Ad Hoc Group of Hospitals**

4. In accordance with Bankruptcy Rule 2019, the list of the names and addresses of, and the nature and amount of all disclosable economic interests held by, each member of the Ad Hoc Group of Hospitals, directly or through entities managed or advised by such member, in relation to the Debtors is set forth on Exhibit A. The information set forth in this Amended Verified Statement and on Exhibit A, including the claims of the Ad Hoc Group of Hospitals and related claim amounts have been provided to M&B by the applicable counsel to the members of the Ad Hoc Group of Hospitals, and by filing this Verified Statement, the Ad Hoc Group of Hospitals (and each member thereof) makes no representation with respect to the amount, allowance, validity, secured status or priority of such claims and reserves all rights with respect thereto.

5. Nothing contained in this Amended Verified Statement or Exhibit A hereto should be construed as a limitation upon or waiver of any rights of any existing or new member of the Ad Hoc

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<sup>2</sup> M&B also may serve as its respective clients' representatives on the Ad Hoc Group of Hospitals and represents the so-called "Hospital Claimants," as putative class representatives in connection with their request to file a Class Proof of Claim.

Group of Hospitals to assert, file and/or amend its claim(s) in accordance with applicable law and any orders entered in these chapter 11 cases establishing procedures for filing proofs of claim (including the right to file a consolidated proof of claim on behalf of all members of the Ad Hoc Group of Hospitals).

6. The Ad Hoc Group of Hospitals reserves the right to amend or supplement this Amended Verified Statement (including Exhibit A) in accordance with the requirements set forth in Bankruptcy Rule 2019.

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New York, New York  
Dated: July 29, 2020

**MCGRAIL & BENSINGER LLP**

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**CERTIFICATE OF SERVICE**

I, Pearl Shah, hereby certify that a true and correct copy of the *Second Amended Verified Statement Of The Ad Hoc Group Of Hospitals Pursuant To Bankruptcy Rule 2019* will be forwarded by electronic transmission to all parties registered to receive electronic notice in these cases, as identified on the Notice of Electronic Filing (NEF), via this Court's CM/ECF system. I also certify that service is being made via first-class mail upon the parties listed on the Master Service List maintained by Prime Clerk. Further service is made, pursuant to the *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures* (ECF No. 498), upon the following parties:

Honorable Judge Robert D. Drain  
United States Bankruptcy Court  
Southern District of New York  
300 Quarropas Street, Room 248  
White Plains, NY 10601  
***Via Federal Express***

Attn: Paul K. Schwartzberg  
Office of the United States Trustee  
Southern District of New York  
201 Varick Street, Suite 1006  
New York, NY 10014  
***Via First-Class Mail***

/s/ Pearl Shah  
Pearl Shah